



MEMORANDUM

TO: Rick Crume, Environmental Protection Agency

FROM: Susan Radomski, Eastern Research Group

DATE: November 24, 1997

SUBJECT: Final Summary of July 30, 1997, Incinerator Work Group Meeting

1.0 INTRODUCTION AND PURPOSE OF MEETING

The July 30 meeting was the tenth meeting of the Incinerator Work Group for the Industrial Combustion Coordinated Rulemaking (ICCR). The major goal of this meeting was to discuss both the Coordinating Committee recommendations to the Work Group and upcoming Work Group activities. To achieve this goal, the Work Group received a review of the July Coordinating Committee Meeting, discussed the subteam database reviews, and introduced the regulatory alternatives "white paper" as a topic for future discussion.

2.0 LOCATION AND DATE

This Work Group meeting was held via teleconference from 11:00 am to 1:30 pm EDT on July 30, 1997. A copy of the draft meeting agenda is included as attachment 1.

3.0 ATTENDERS

The Incinerator Work Group meeting was open to the public. Participants at the meeting included representatives of the EPA, industry, State and local governments, and the environmental community. A copy of the attendance list for the meeting is included as attachment 2. A copy of the Incinerator Work Group membership list is available on the TTN.

4.0 DISCUSSION

After brief introductions, the Work Group received updates about the July Coordinating Committee Meeting, discussed the activities for the upcoming year, and received database guidance review. These discussion topics are summarized in the sections that follow.

4.1 General Updates

Updates were provided about several issues, including the TTN, the Information Collection Request, the status of the ICWI litigation, and upcoming Coordinating Committee meetings.

4.1.1 Technology Transfer Network (TTN)

Work Group Members were reminded that EPA policy requires files posted on the TTN to conform to the format of WordPerfect 6.1 or Adobe Acrobat. Also, information to be presented at a Coordinating Committee Meeting must be sent to the EPA for posting to the TTN ten days before the meeting.

4.1.2 Information Collection Request (ICR)

It was stated that over 12,000 ICR surveys were mailed out in early June, and 5000 had been returned by the time of the July Coordinating Committee Meeting. The returned surveys are currently being reviewed to see if they include Confidential Business Information and, if so, will be handled accordingly. The ICR information and any database updates by the Work Group need to be submitted by the end of August. The Inventory Database will be updated with the ICR information and could be released by the end of October.

4.1.3 ICWI Litigation

The Work Group received a timeline for the ICWI litigation. The Work Group has been asked by the Coordinating Committee to help the EPA meet the November 1998 deadline for a regulatory alternatives “white paper.”

4.1.4 Coordinating Committee Meetings

The Work Group was reminded of the Coordinating Committee Meeting to be held on September 16-17 in Research Triangle Park. Another Coordinating Committee Meeting will take place in Houston on November 18 - 19. Work Group members were encouraged to obtain a copy of the meeting agenda from the TTN.

4.2 Review of the July Coordinating Committee Meeting

Norman Morrow provided a review of the July Coordinating Committee Meeting. He discussed the Petroleum Environmental Research Forum (PERF) data presented by the Process Heater Work Group, along with the response of the Coordinating Committee to the data. Mr. Morrow also reviewed the names of people chosen to participate in the Solid Waste Definition Subgroup. Mr. Morrow noted that Subteams 2 and 4 from the Incinerator Work Group and the IC Engine Work Group gave scoping recommendations to the Coordinating Committee and received suggested follow-up action items from the Committee. More detailed comments from Mr. Morrow on the July Coordinating Committee Meeting are presented below.

4.2.1 Process Heater Work Group Presentation of PERF Data

Following the PERF data presentation by the Process Heater Work Group, the Coordinating Committee provided many suggestions on data presentation. Specifically, more back-up data for the docket and information on test methods were requested of the Work Group. The Coordinating Committee also asked the Work Group to outline the basis upon which some HAPs were chosen for testing, but others were not. Several of the Coordinating Committee recommendations should be used by all Work Groups when preparing presentations. For instance, it is important for the Work Group to clearly define the goals of the presentation. The logic behind any conclusions that are drawn should be included.

4.2.2 Solid Waste Definition Subgroup

The Coordinating Committee created an ad hoc group to determine whether a definition of solid waste is needed for the purposes of rules developed under the ICCR. The Solid Waste Definition Subgroup was instructed to begin with the definition of solid waste found in RCRA 261.2. If the definition decided on by the subgroup deviates from that found in RCRA, a clear explanation for this deviation is requested. A list of Subgroup members may be found in attachment 3.

4.2.3 Incinerator Work Group Presentation

Subteams 2 and 4 made presentations to the Coordinating Committee about scoping recommendations. The recommendations of both subteams were accepted. The Committee requested that the subteams identify any records that have been incorrectly included in the

Incinerator Inventory database and pass these records on to the appropriate Work Group(s). Also, Subteam 2 was asked to decide if mercury and dioxins need to be looked at specifically. The Coordinating Committee also requested that environmental justice issues, such as the high percentage of flares located in disadvantaged areas, be kept in mind.

4.2.4 Testing Method Work Group

The Coordinating Committee requested that the Testing Method Work Group develop a “white paper” on pollutants to be considered by the Source Work Groups. This paper should include general pollutants occurring due to incomplete combustion, as well as pollutants unique to a given process.

4.2.5 Internal Combustion Engine Presentation

The IC Engine Work Group suggested 37 HAPs to be considered during the collection of test data. The Work Group presented supporting data showing evidence of these HAPs occurring in IC Engine emissions. The Coordinating Committee agreed that the list of HAPs are a good starting point, but that they may not be the only pollutants present, and suggested that criteria pollutants, mercury, and dioxins be tested as well.

4.3 Schedule of Activities for the Coming Year

Norman Morrow outlined the responsibilities of the Work Group and the individual Subteams.

4.3.1 ICWI Regulatory Alternatives Recommendation

The Coordinating Committee requested support from the Incinerator Work Group in developing recommendations for a “white paper” to be submitted by EPA in response to the ICWI litigation. Rick Crume is developing guidance to assist the Work Group with this task. To develop recommendations for the Coordinating Committee, the Work Group must complete a review of the ICCR Inventory Database, develop subcategories, decide how to deal with data gaps and plan any necessary testing. A Work Group member requested a presentation by the EPA on the availability of funds for testing.

4.3.2 Database Review

The Work Group Subteams need to complete a review of the ICCR Inventory Database. Units in the database that are not incinerators need to be transferred to the appropriate Source

Work Groups. The Work Group also needs to identify any incinerators in the database that are regulated by other MACT Standards.

4.3.3 Subteam Status

Subteams 2 and 4 have presented scoping issues to the Coordinating Committee, as discussed above. Subteams 1, 3 and 5 are working toward subcategorization by the September meeting. The focus of the September 3 Work Group meeting will be to finalize papers for these three Subteams for presentation to the Coordinating Committee.

4.3.4 Work Group Name Change

The discussion of a possible name change for the Incinerator Work Group was postponed until the September 3 meeting.

4.3.5 Nominations of Stakeholder Co-chair and Alternate for Consideration by the Coordinating Committee

Nominations for the Work Group Stakeholder Co-chair and Alternate need to be presented to the Coordinating Committee by the September 18 meeting. Work Group members are asked to forward nominations to Rick Crume for consideration at the September 3 meeting.

4.4 Database Cross Referencing

Chad White discussed the Inventory and Emission Test Databases. He verified that there is no method for cross referencing units between the two databases, and no effort is planned to create such a method. He explained that the purpose of the Inventory Database is to provide population information on combustion units. The Emission Test Database, which provides data from emission tests on combustion units, is being developed separately from the Inventory Database.

5.0 ACTION ITEMS

The following action items will be conducted by members of the Work Group:

- Beth Berglund will contact Doug Finan at Glaxo Wellcome about a possible tour of the Research Triangle Park Glaxo Wellcome facility.

- Rick Crume and Norman Morrow will coordinate and make arrangements to hold the September 3 meeting in Washington DC.
- Rick Crume will develop a fact sheet about regulatory alternatives and distribute this to the Work Group at the September 3 meeting.
- Any Work Group Member interested in nominating a Stakeholder Co-chair and Alternate should contact Rick Crume in advance of the September 3 meeting.
- The Work Group Co-chairs will develop a status table template to track the progress of each of the incinerator subcategories. This status table is intended for subteam use when reporting progress to the Work Group.

6.0 NEXT MEETINGS

The Work Group decided that holding a meeting on September 3 was preferable to a teleconference, given the goal of presenting scoping recommendations to the Coordinating Committee at its September 16 and 17 meeting. The Work Group decided to schedule its upcoming meetings as follows:

- August 22: teleconference for the Solid Waste Definition Subgroup representatives and support group; EPA to arrange a call-in number, 10 am - 11:30 am EDT
- September 3: Work Group meeting, tentatively to be held in Washington, DC
- September 18: Work Group meeting to be held at the Omni Hotel in Durham, North Carolina (note: the Coordinating Committee will meet in Durham, North Carolina on September 16 and 17)
- October 28: Work Group meeting tentatively to be held in Research Triangle Park, North Carolina
- November 20: Work Group meeting scheduled for Houston, Texas (note: the Coordinating Committee will meet in Houston on November 18 and 19)

These minutes represent an accurate description of matters discussed and conclusions reached and include a copy of all reports received, issued, or approved at the July 30, 1997, meeting of the Incinerator Work Group. Rick Crume, EPA Co-chair.

ATTACHMENTS

Attachment 1: Draft Meeting Agenda

Attachment 2: Meeting Attenders

Attachment 3: Solid Waste Definition Subgroup Membership List

ATTACHMENT 1

Draft Meeting Agenda

INCINERATOR WORK GROUP TELECONFERENCE

July 30, 1997; 11:00am-1:30pm

Call-in Number: (919) 541-4486

- | | |
|---------------|--|
| 11:00-11:10am | Convene and Mtg Agenda Review (R. Crume) |
| 11:10-12:00pm | <p>Review of July 22 and 23 CC Meeting (N. Morrow)</p> <ul style="list-style-type: none">• Overview of Meeting• CC comments on WG presentation/recommendations• Completing initial database review by subteams• Regulatory options (“white paper”) and ICWI categories |
| 12:00-12:30pm | Schedule of Activities for the Coming Year (N. Morrow and R. Crume) |
| 12:30-12:40pm | Discussion of Name Change for the Incinerator WG (B. Morris) |
| 12:40-12:50pm | <p>Discussion about the Database Review Guidance (C. White, ERG)</p> <ul style="list-style-type: none">• Update on the ability to cross-reference facilities Ids among databases• Work Group comments |
| 12:50-12:55pm | Nominations of Stakeholder Co-chair and alternate for Consideration by the CC (R. Crume) |
| 12:55-1:10pm | <p>Next Meetings (R. Crume)</p> <ul style="list-style-type: none">• Sept. 3: WG teleconference, 11am - 4pm EDT
(Call-in Number: 919-541-4486)<ul style="list-style-type: none">- change to a meeting in person in RTP?- agenda items?• September 18: WG meeting to be held in Research Triangle Park, North Carolina (note: the Coordinating Committee will meet in Research Triangle Park on September 16 and 17)• September 18 or 19: tour of Glaxo Wellcome incinerators (tentative)• October meeting?• November 20: WG meeting scheduled for Houston, Texas (note: the Coordinating Committee will meet in Houston on November 18 and 19) |

DRAFT AGENDA (continued)

1:10-1:20pm Other Business (open to WG for discussion or comment)

1:20-1:30pm Approval of Flash Minutes

1:30pm Close (R. Crume)

ATTACHMENT 2

Meeting Attenders

Name	Affiliation
Beth Berglund	Merck Co.
Rick Crume	U.S. EPA/OAQPS
Larry Faith	Shell Development Company
Leslye Fraser	U.S. EPA/OGC
John Huyler	The Keystone Center
Ruth Mahr	Environmental interests
James Malcolm	U.S. EPA/Small Business Office
David Marrack	Galveston-Houston Association for Smog Prevention
Norman Morrow	Exxon Chemical Americas
George Parris	American Wood Preservers Institute
Bill Perdue	Pulaski Furniture Corporation
Fred Porter	U.S. EPA/OAQPS
Susan Radomski	Eastern Research Group, Inc.
Andrew Roth	Regional Air Pollution Control Agency (Dayton, Ohio)
Kay Rykowski	Harding Lawson Associates
Jeff Shumaker	International Paper
George Smith	U.S. EPA/OAQPS
Tom Tyler	Institute of Scrap Recycling Industries
Dick Van Frank	National Audubon Society
Tom Waddell	Eastern Research Group, Inc.
Ed Wheless	Los Angeles County Sanitation District
Chad White	Eastern Research Group, Inc.
William Wiley	Consumat Systems, Inc.
Dana Wooster	The Association of Container Reconditioners

ATTACHMENT 3

SOLID WASTE DEFINITION SUBGROUP MEMBERSHIP LIST

Attachment 3: Solid Waste Definition Subgroup Membership List

Industrial Combustion Coordinated Rulemaking Solid Waste Definition Subgroup Membership as of July 23, 1997

David Cooper
Jim Eddinger
Frank Ferraro
Chuck Ferridas

Mike Fisher
John Ramsey
Marvin Schorr
Mike Soots

Jeff Shumaker
Dick Van Frank
Jane Williams